

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**RICHARD PETERSON,**

**PLAINTIFF,**

**VS.**

**TOWN OF CLAYTON, ALABAMA**

**DEFENDANT.**

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**CASE NO.: 2:06-CV-110-VPM**

**RESPONSE TO MOTION FOR A  
MORE DEFINITE STATEMENT**

Comes now the Plaintiff, Richard Peterson, and in reply to the Defendant's Motion (Doc. 5-1) and the Order of April 18<sup>th</sup> (Doc. 10) says as follows:

1. Plaintiff claims that the Defendant, acting through its authorized agent, terminated his employment because of Plaintiff's race (black); and,
2. Defendant terminated Plaintiff's employment in retaliation for Plaintiff complaining that the failure to accommodate his work schedule was racially motivated.
3. Plaintiff intends to assert and prove that both the denial of accommodation and termination were motivated by his race (Black).

Malcolm R. Newman, Attorney, P.C.

/s/ Malcolm R. Newman  
Malcolm R. Newman (NEW017)

Attorney for Plaintiff  
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ASB-2826-M39M

**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Todd Derick  
Post Office Box 6346  
Dothan, Alabama 36302

/s/ Malcolm R. Newman  
Malcolm R. Newman, Esq.